
310.35

Staff Conflict of Interest

Overview

Policy	Local WIC agencies shall ensure that every precaution is taken to prevent possible conflicts of interests by employed and contracted WIC staff.
Purpose	The purpose of this policy is to prevent conflict of interest, or the illusion of partiality by WIC employed or contracted WIC staff towards themselves, their close personal relationships, vendors, or other WIC participants.
Procedure	<p>All employed and contracted WIC staff must read and sign the staff conflict of interest form at the time of hire. All potential conflicts of interest at the time of hire or during employment must be identified and appropriate measures should be in place to maintain the integrity of the WIC program. The signed and dated form must be filed in the employee's personnel file. If a WIC staff becomes a WIC participant during employment, a new conflict of interest form should be signed and filed in the employee's personnel file.</p> <p><u>Example:</u> A support staff who works for the agency for five years receives an evening position as a pharmacy technician, in addition to the WIC position, at a local Special Purpose Vendor. The employee must identify the change on a new conflict of interest form. The form should be signed and filed in the employee's personnel file.</p>
Vendors	Each local WIC agency must inform all staff hired to work in the WIC Program that they are prohibited from using their position to influence a WIC participant's selection of a WIC vendor. Local agencies must establish safeguards to prevent employees from using their positions for the purposes that are, or give the appearance of being, motivated by the desire for private gain for themselves or others with who they have a close personal relationship, business or other ties.

What are close personal relationships?	Close personal relationships include relatives that are within the second degree of relation and affinity and include spouses, parents, children, grandchildren, grandparents, siblings, aunts, uncles, nieces, nephews, and first cousins by blood or by marriage.
Separation of duties	At least one other local agency employee must be involved in the certification process and issuing benefits to staff or their relatives or close friends. See Policy 225.50.
Suspected fraud or abuse	All employed or contracted WIC personnel may call the State WIC Office (1-800-532-1579) to confidentially report suspected fraud or abuse by another employee. The report may be anonymous.
